

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESale PRICE)	
LITIGATION)	MDL No. 1456
)	Civil Action No. 01-12257-PBS
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THIS DOCUMENT RELATES TO:)	Hon. Patti B. Saris
)	
<i>United States of America, ex rel. Ven-A-Care</i>)	Magistrate Judge Marianne B. Bowler
<i>of the Florida Keys, Inc. v. Abbott</i>)	
<i>Laboratories Inc.,</i>)	
CIVIL ACTION NO. 06-CV-11337-PBS)	

**JOINT MOTION FOR ENLARGEMENT
OF TIME TO COMPLETE SIX DEPOSITIONS**

The United States and Abbott Laboratories Inc. (Abbott) jointly move for an enlargement of time to conduct and/or complete the depositions of six witnesses after the March 31, 2008 discovery cutoff in the above-captioned matter. The witnesses are:

- Chandra Coleman (a former Abbott Alternate Site Salesperson)
- Sam Colon (a former Abbott Alternate Site Salesperson)
- David Zackowski (a former Abbott Alternate Site Salesperson)
- Kim Howell (a Centers for Medicare and Medicaid Services (CMS) employee)
- Donald Thompson (a CMS Rule 30(b)(6) witness)
- A 30(b)(6) Witness for Administar (in its capacity as a CMS DMERC)

Both parties moved diligently to get these depositions scheduled before the discovery cutoff in this matter. Unfortunately, either illness, unavailability or other unresolvable scheduling conflicts prevented these six witnesses from being deposed by March 31. While firm

dates have yet to be set for these witnesses, the parties will endeavor to complete the depositions on or before April 30, 2008.

Respectfully submitted,

For the United States of America,

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Dated: March 31, 2008

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Dated: March 31, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused an electronic copy of the above **JOINT MOTION FOR ENLARGEMENT OF TIME TO COMPLETE SIX DEPOSITIONS**, to be served on all counsel of record via electronic service pursuant to Paragraph 11 of Case Management Order No. 2 by sending a copy to LexisNexis File & Serve for posting and notification to all parties.

/s/ Gejaa T. Gobena

Dated: March 31, 2008